



February 20, 2008

**VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Sterling Communications, Inc. (499 Filer ID # 826052), please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely,

A handwritten signature in cursive script that reads "Jean Langkop by DM".

Jean Langkop  
Authorized Representative of  
Sterling Communications, Inc.

JL/DM/pjf

Attachments

cc: Enforcement Bureau, Telecommunications Consumers Division  
(2 copies via USPS mail)  
Best Copy and Printing, Inc (via email [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
Mr. Tom Gillihan, Sterling Communications, Inc.



**EB DOCKET NO. 06-36**

14945 SW Sequoia Parkway  
Portland, OR 97224  
503.255.5555  
www.sterling.net

**Certification of CPNI Compliance**

My name is Tom Gillihan, and I am the President of Sterling Communications, Inc. ("the Company") of 14945 SW Sequoia Parkway, Suite 110, Portland, OR 97224. I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("FCC") customer proprietary network information ("CPNI") rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations, Sections 64.2001 through 64.2011.

This certification is made pursuant to the requirements of the Federal Communications Commission ("FCC") under Section 64.2009(e) of the FCC rules. Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

During the past year (2007) the Company has taken no action against data brokers and received no customer complaints concerning the unauthorized release of CPNI.

Signature

Tom Gillihan  
President

Date 2.19.08



14945 N. W. Sequoia Parkway  
Suite 110  
Portland, OR 97224  
503.268.6666  
603.668.8761

[www.sterling.net](http://www.sterling.net)

## ACCOMPANYING STATEMENT

To the best of my knowledge, Sterling Communications, Inc. ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations: 47 C.F.R §64.2001 through §64.2011. Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

**Company CPNI Status:** To the best of my knowledge and belief, the Company does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009.